

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

WORLD WRESTLING ENTERTAINMENT, INC.,

Plaintiff,

vs.

JAKKS PACIFIC, INC., JAKKS PACIFIC (H.K.) LIMITED, ROAD CHANMPS LIMITED, THQ, INC., THQ/JAKKS PACIFIC L.L.C., THE JOINT VENTURE OF THQ, INC., STANLEY SHENKER ASSOCIATES, INC., STANLEY SHENKER, BELL LICENSING, L.L.C., JAMES BELL, JACK FRIEDMAN, STEPHEN BERMAN and JOEL BENNETT,

Defendants.

Civil Action No. 1:04-cv-08223-KMK  
Electronically Filed

LYDIA GARCIA, individually and on behalf of all others similarly situated,

Plaintiff,

vs.

JAKKS PACIFIC, INC., JACK FRIEDMAN, STEPHEN BERMAN and JOEL BENNETT,

Defendants.

Civil Action No. 1:04-cv-08807-KMK  
Electronically Filed

QUANTUM EQUITIES L.L.C., individually and on behalf of all others similarly situated,

Plaintiff,

vs.

JAKKS PACIFIC, INC., JACK FRIEDMAN, STEVEN G. BERMAN and JOEL M. BENNETT,

Defendants.

Civil Action No. 1:04-cv-08877-KMK  
Electronically Filed

(captions continued on following page)

**MOTION OF QUANTUM EQUITIES LLC AND FRANK WHITING  
FOR CONSOLIDATION, APPOINTMENT AS LEAD PLAINTIFF  
AND APPROVAL OF SELECTION OF LEAD COUNSEL**

JAMES T. KAHN, on behalf of himself and all others similarly situated,

Plaintiff,

vs.

JAKKS PACIFIC, INC., JACK FRIEDMAN, JOEL BENNETT and STEPHEN BERMAN,

Defendants.

Civil Action No. 1:04-cv-08910-KMK  
Electronically Filed

JONCO INVESTORS, LLC, individually and on behalf of all others similarly situated,

Plaintiff,

vs.

JAKKS PACIFIC, INC., JACK FRIEDMAN, STEPHEN BERMAN and JOEL BENNETT,

Defendants.

Civil Action No. 1:04-cv-09021-KMK  
Electronically Filed

JAMES IRVINE, individually and on behalf of all others similarly situated,

Plaintiff,

vs.

JAKKS PACIFIC, INC., JACK FRIEDMAN, STEPHEN BERMAN and JOEL BENNETT,

Defendants.

Civil Action No. 1:04-cv-09078-KMK  
Electronically Filed

**MOTION OF QUANTUM EQUITIES LLC AND FRANK WHITING  
FOR CONSOLIDATION, APPOINTMENT AS LEAD PLAINTIFF  
AND APPROVAL OF SELECTION OF LEAD COUNSEL**

Plaintiffs Quantum Equities LLC and Frank Whiting, upon the January 4, 2005 Declaration of Gustavo Bruckner, Esq., and the exhibits annexed thereto, the accompanying Memorandum of Law, all of the prior pleadings and proceedings had herein, and such other evidence as the Court

may consider at the hearing on this motion, moves this Court for an order in the form filed herewith:  
(i) consolidating the above-referenced actions; (ii) appointing Quantum Equities LLC and Frank Whiting as Lead Plaintiff in the above-referenced actions pursuant to Section 21D of the Securities Exchange Act of 1934, as amended by the Private Securities Litigation Reform Act of 1995; and  
(iii) approving Lead Plaintiff's selection of Lead Counsel.

DATED: January 4, 2005  
New York, NY

Respectfully submitted,

**WOLF HALDENSTEIN ADLER  
FREEMAN & HERZ LLP**

By: /s/  
Fred Taylor Isquith, Esq.  
Gustavo Bruckner, Esq.  
Christopher Hinton, Esq.  
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**Proposed Lead Counsel**

Louis F. Burke, Esq.  
**Louis F. Burke P.C.**  
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New York, NY 10022  
Telephone: 212/682-1700  
Facsimile: 212/808-4280

**Additional Plaintiffs' Counsel**

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK**

WORLD WRESTLING ENTERTAINMENT, INC.,

Plaintiff,

vs.

JAKKS PACIFIC, INC., JAKKS PACIFIC (H.K.)  
LIMITED, ROAD CHANMPS LIMITED, THQ, INC.,  
THQ/JAKKS PACIFIC L.L.C., THE JOINT  
VENTURE OF THQ, INC., STANLEY SHENKER  
ASSOCIATES, INC., STANLEY SHENKER, BELL  
LICENSING, L.L.C., JAMES BELL, JACK  
FRIEDMAN, STEPHEN BERMAN and JOEL  
BENNETT,

Defendants.

Civil Action No. 1:04-cv-08223-KMK  
Electronically Filed

LYDIA GARCIA, individually and on behalf of all  
others similarly situated,

Plaintiff,

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JAKKS PACIFIC, INC., JACK FRIEDMAN,  
STEPHEN BERMAN and JOEL BENNETT,

Defendants.

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QUANTUM EQUITIES L.L.C., individually and on  
behalf of all others similarly situated,

Plaintiff,

vs.

JAKKS PACIFIC, INC., JACK FRIEDMAN,  
STEVEN G. BERMAN and JOEL M. BENNETT,

Defendants.

Civil Action No. 1:04-cv-08877-KMK  
Electronically Filed

(captions continued on following page)

**[PROPOSED] ORDER**

JAMES T. KAHN, on behalf of himself and all others similarly situated,

Plaintiff,

vs.

JAKKS PACIFIC, INC., JACK FRIEDMAN, JOEL BENNETT and STEPHEN BERMAN,

Defendants.

Civil Action No. 1:04-cv-08910-KMK  
Electronically Filed

JONCO INVESTORS, LLC, individually and on behalf of all others similarly situated,

Plaintiff,

vs.

JAKKS PACIFIC, INC., JACK FRIEDMAN, STEPHEN BERMAN and JOEL BENNETT,

Defendants.

Civil Action No. 1:04-cv-09021-KMK  
Electronically Filed

JAMES IRVINE, individually and on behalf of all others similarly situated,

Plaintiff,

vs.

JAKKS PACIFIC, INC., JACK FRIEDMAN, STEPHEN BERMAN and JOEL BENNETT,

Defendants.

Civil Action No. 1:04-cv-09078-KMK  
Electronically Filed

**[PROPOSED] ORDER**

Having considered the Motion of Quantum Equities LLC and Frank Whiting for Appointment as Lead Plaintiff, and Approval of Selection of Lead Counsel, and the Memorandum of Law and Declaration of Gustavo Bruckner, Esq. in support thereof, and good cause appearing therefor:

**MASTER DOCKET AND MASTER FILES**

1. A Master File is hereby established for this proceeding. The Master File shall be 1:04-cv-\_\_\_\_\_. The Clerk shall file all pleadings in the Master File and note such filings on the Master Docket.
2. An original of this Order shall be filed by the Clerk in the Master File.

**CAPTION OF THE CASE**

3. Every pleading filed in the Action shall have the following caption:

-----X  
**IN RE JAKKS PACIFIC, INC.** :  
**SECURITIES LITIGATION** : 1:04-cv-\_\_\_\_\_  
-----X

**APPOINTMENT OF LEAD PLAINTIFF AND LEAD COUNSEL**

1. Quantum Equities LLC and Frank Whiting are appointed as Lead Plaintiff pursuant to 15 U.S.C. § 78u-4(a)(3)(B).
2. The law firm of Wolf Haldenstein Adler Freeman & Herz LLP is hereby appointed Lead Counsel.
3. With the approval of the Court, Lead Counsel shall assume and exercise the following powers and responsibilities:

- a. To coordinate the briefing and argument of motions;
- b. To coordinate the conduct of written discovery proceedings;
- c. To coordinate the examination of witnesses in depositions;
- d. To coordinate the selection of counsel to act as spokesperson at pre-trial conferences;
- e. To call meetings of the plaintiffs' counsel as they deem necessary and appropriate from time to time;

- f. To conduct all settlement negotiations with counsel for the defendants;
- g. To coordinate and direct the preparation for trial, and the trial of this matter and to delegate work responsibilities to selected counsel as may be required;
- h. To receive orders, notices, correspondence and telephones calls from the Court on behalf of all plaintiffs, and to transmit copies of such telephone calls to plaintiffs' counsel; and
- i. To supervise any other matters concerning the prosecution or resolution of the action.

4. With respect to scheduling and/or procedural matters, defendants' counsel may rely upon all agreements with Lead Counsel.

5. No pleadings or other papers shall be filed or discovery conducted by any plaintiff except as directed or undertaken by Lead Counsel.

6. Counsel in any related action that is consolidated with this Action shall be bound by this organizational structure of plaintiffs' counsel.

**SERVICE OF PLEADINGS AND OTHER PARTIES**

1. Service by the defendants on plaintiffs of any papers shall be deemed to be complete for all purposes when a copy is served on Lead Counsel.

IT IS SO ORDERED.

DATED: \_\_\_\_\_

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U.S.D.J.